

**REMARKS**

Claims 1, 3-8, 11-15, 17-19, 22-32, 34-36, 38 and 39 are pending in the present application. Applicants respectfully request reconsideration of the application is respectfully requested.

**I. Rejections Under 35 U.S.C. § 103**

Claims 1, 3-8, 11-15, 17-19, 22-32, 34-36, 38 and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,797,007 issued to *Erickson et al.* (hereinafter "*Erickson*") in view of U.S. Patent Application Publication No. 2003/0140308 attributed to *Murthy et al.* (hereinafter "*Murthy*"), in further view of U.S. Patent No. 6,470,344 issued to *Kothuri et al.* (hereinafter "*Kothuri*"), for the reasons set forth on pages 2-9 of the Office Action.

The independent claims are Claims 1, 15, 26 and 38.

Claims 1, 15 and 38 claim, *inter alia*, "receiving as input an entity definition of a persistent storage structure, wherein the entity definition comprises a declaration of an object, one or more properties of the object, and a data type for each property; parsing the entity definition to determine logical structures and properties for the declared object." Claim 26 claims, *inter alia*, "an interface for receiving an entity definition of a persistent storage structure, the entity definition comprising a declaration of an object, one or more properties of the object, and a data type for each property, and for processing the entity definition to determine logical structures and properties for the declared object; and a utility module for automatically configuring an autonomous persistent storage system in accordance with the processed entity definition."

The combination of *Erickson*, *Murthy* and *Kothuri* teaches methods for determining a database representation from a model (an XML schema) and objects for storing data.

*Erickson* teaches a single base class, SOMObject, which includes general methods that are inherited by all of its subclasses (see column 3 lines 66-67, column 4 lines 1-10). *Erickson* teaches a DefaultEncoderDecoder class, which includes a “get” and “set” method for use by all objects, to implement flexible, generalized storage of object information (see column 4 lines 55-67). *Erickson* teaches that a system is built over a object framework. The construction of the system according to *Erickson* involves the use of an object framework and abstract classes. *Erickson* does not teach the use of a entity definition comprising a object declaration, properties of the object and data types of the properties. Therefore, *Erickson* fails to teach or suggest all of the limitations of Claims 1, 15, 26 and 38.

The rejection relies of *Murthy* with respect to the limitation “parsing the entity definition to determine logical structures and properties for the declared object.” Respectfully, *Murthy* teaches a method allowing users to register XML schemas in a database system and mapping constructs defined in the XML schema to constructs supported by the database system. More particularly, *Murthy* teaches that database objects, collection types, constraints, and indexes to be used by the database to store data from XML documents (see paragraph [0032]). Here, *Murthy* uses an XML schema mapper to map each type of construct to a construct supported by the database (see paragraph [0063]). Paragraphs [0063-0068] detail different mappings. The mapping of *Murthy* is not analogous to the claimed entity definition. For example, the mapping of *Murthy* needs to consider the target object-relational database system; the XML schema does not define objects directly, but instead must have structure and constraints mapped to an existing target object-relational database system. Therefore, *Murthy* fails to teach or suggest “parsing the

entity definition to determine logical structures and properties for the declared object”, wherein the “entity definition comprises a declaration of an object”. Therefore, *Murthy* fails to cure the deficiencies of *Erickson*.

*Kothuri* teaches a relational or object-relational database management system (see column 6 lines 23-33). *Kothuri* does not teach or suggest how to parse an entity definition to determine the relational or object-relational database management system, as essentially claimed in Claims 1, 15, 26 and 38. *Kothuri* merely teaches methods for handling data stored in the system without reference to how the system is generated. Therefore, *Kothuri* fails to cure the deficiencies of *Erickson* and *Murthy*.

The combination of *Erickson*, *Murthy* and *Kothuri* teaches methods for determining a database representation from a model (an XML schema) and objects for storing data. The combination clearly does not teach or suggest how to parse an entity definition to determine logical structures and properties for a declared object used in generating a persistent storage structure, as essentially claimed in Claims 1, 15, 26 and 38. Accordingly, the combination does not teach each and every limitation of Claims 1, 15, 26 and 38.

Therefore, for at least the reasons above, Claims 1, 15, 26 and 38 are believed to be patentable and non-obvious over the combination of *Erickson*, *Murthy* and *Kothuri*. Applicants respectfully submit that inasmuch as Claims 3-8, 11-14, 17-19, 22-25, 27-32, 34-36 and 39 are dependent on Claims 1, 15, 26 and 38, and Claims 1, 15, 26 and 38 are patentable over the cited references, Claims 3-8, 11-14, 17-19, 22-25, 27-32, 34-36 and 39 are patentable as dependent on patentable independent claims. Withdrawal of the instant rejections is respectfully requested.

**CONCLUSION**

In view of the foregoing, it is believed that all claims now pending patentability define the subject invention over the prior art of record and are in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

Date: November 25, 2008

By: /Nathaniel T. Wallace/  
Nathaniel T. Wallace  
Reg. No. 48,909  
Attorney for Applicant(s)

F. Chau & Associates, LLC  
130 Woodbury Road  
Woodbury, New York 11797  
TEL: (516) 692-8888  
FAX: (516) 692-8889